

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

EXXON MOBIL CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:16-CV-469-K
	)	
MAURA TRACY HEALEY, Attorney	)	
General of Massachusetts, in her official	)	
capacity,	)	
	)	
Defendant.	)	
	)	
	)	

**SUPPLEMENTAL APPENDIX IN SUPPORT OF  
ATTORNEY GENERAL HEALEY’S REPLY TO  
EXXON MOBIL CORPORATION’S OPPOSITION TO  
ATTORNEY GENERAL HEALEY’S MOTION TO DISMISS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>	<b><u>Page(s)</u></b>
N/A	Declaration of Peter C. Mulcahy (Sept. 16, 2016)	iv - v
A	Excerpt from Exhibit A (“transcript of the AGs United for Clean Power Press Conference, held on March 29, 2016”), App. 013-014, Appendix in Support of Exxon Mobil Corporation’s Complaint	Supp. App. 001 - 003
B	Cover Page and Table of Contents from Memorandum of Exxon Mobil Corporation In Support of Its Emergency Motion to Set Aside or Modify the Civil Investigative Demand or Issue a Protective Order, <i>In re Civil Investigative Demand No. 2016-EPD-36, Issued by the Office of the Attorney General</i> , No. 16-1888-F (Mass. Super. Ct. Jun. 16, 2016)	Supp. App. 004 - 007

Dated: September 16, 2016

Respectfully submitted,

MAURA HEALEY  
ATTORNEY GENERAL OF  
MASSACHUSETTS

By her attorneys:

Richard Johnston (*pro hac vice*)  
Chief Legal Counsel  
richard.johnston@state.ma.us  
Melissa A. Hoffer (*pro hac vice*)  
Chief, Energy and Environment Bureau  
melissa.hoffer@state.ma.us  
Christophe G. Courchesne (*pro hac vice*)  
Chief, Environmental Protection Division  
christophe.courchesne@state.ma.us  
I. Andrew Goldberg (*pro hac vice*)  
andy.goldberg@state.ma.us  
Peter C. Mulcahy (*pro hac vice*)  
peter.mulcahy@state.ma.us  
Assistant Attorneys General  
OFFICE OF THE ATTORNEY GENERAL  
One Ashburton Place, 18th Floor  
Boston, MA 02108  
(617) 727-2200

s/ Douglas A. Cawley  
Douglas A. Cawley  
Lead Attorney  
Texas State Bar No. 04035500  
dcawley@mckoolsmith.com  
Richard A. Kamprath  
Texas State Bar No. 24078767  
rkamprath@mckoolsmith.com  
MCKOOL SMITH, P.C.  
300 Crescent Court, Suite 1500  
Dallas, Texas 75201  
(214) 978-4000  
Fax (214) 978-4044

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 16, 2016, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

s/ Douglas A. Cawley

Douglas A. Cawley

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

EXXON MOBIL CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:16-CV-469-K
	)	
MAURA TRACY HEALEY, Attorney	)	
General of Massachusetts, in her official	)	
capacity,	)	
	)	
Defendant.	)	
	)	
	)	

**DECLARATION OF PETER C. MULCAHY**

I, Peter C. Mulcahy, declare as follows:

1. My name is Peter C. Mulcahy. I have been admitted to practice law *pro hac vice* in this Court and am an Assistant Attorney General in the Office of Massachusetts Attorney General Maura Healey (“AGO”). I am one of the attorneys representing Maura Healey, Attorney General of Massachusetts, in her official capacity, in this case. I am over 18 years of age and am fully competent in all respects to make this declaration. I have personal knowledge of the facts stated herein, based on my experience or my consultation with others, or they are known to me in my capacity as counsel for Attorney General Maura Healey, and each of them is true and correct.

2. I submit this declaration in support of Attorney General Healey’s Reply to Plaintiff Exxon Mobil Corporation’s Opposition to Attorney General Healey’s Motion to Dismiss.

3. Attached to this declaration as Exhibit A is a true and accurate copy of pages App. 013-014 of Exhibit A (“transcript of the AGs United for Clean Power Press Conference, held on

March 29, 2016, which was prepared by counsel based on a video recording of the event”) of the Appendix in Support of Exxon Mobil Corporation’s Complaint.

4. Attached to this declaration as Exhibit B is a true and accurate copy of the Cover Page and Table of Contents from the Memorandum of Exxon Mobil Corporation In Support of Its Emergency Motion to Set Aside or Modify the Civil Investigative Demand or Issue a Protective Order, *In re Civil Investigative Demand No. 2016-EPD-36, Issued by the Office of the Attorney General*, No. 16-1888-F (Mass. Super. Ct. Jun. 16, 2016).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2016.

s/ Peter C. Mulcahy

Peter C. Mulcahy (*pro hac vice*)

peter.mulcahy@state.ma.us

Assistant Attorney General

OFFICE OF THE ATTORNEY GENERAL

One Ashburton Place, 18th Floor

Boston, MA 02108

(617) 727-2200